

REMARKS

This is in response to the June 7, 2006 non-Final Office Action. Dependent claims 3-6 and 8 are cancelled, dependent claims 39-43 are added and claims 1, 2, 19, 20, 21, 23, 25 and 28 are amended. Claims 1, 2, 7, 9, 10, 19-28 and 30-43 are pending.

Claim Rejections – 35 U.S.C. §103

On page 3, item 3 of the June 7, 2006 Office Action, claims 1-10, 19-28, 30, 33 and 37 were rejected under 35 U.S.C. §103(a) as obvious over Ghahremani et al. (U.S. Patent Publication No. 2005-0180429) in view of Mazza et al. (U.S. Patent Publication No. 2004-199760).

Neither Ghahremani et al. or Mazza et al. disclose or suggest the “chassis comprising a plurality of card slots and a common backplane bus” and the “system manager card” for receiving feature keys representing activation rights for features and the “plurality of application cards operatively disposed in a plurality of slots” recited in independent claims 1 or 19, “wherein the feature rights management agent allocates the feature units among requesting plurality of application cards over the common backplane bus.” The June 7, 2006 Office Action acknowledges that Ghahremani et al. does not disclose or suggest feature keys representing activation rights for features, and therefore combines Mazza et al. with Ghahremani et al. Mazza et al., however, do not disclose or suggest the chassis or the system manager and application cards on a common backplane bus arrangement nor a feature key with feature units.

Ghahremani et al. disclose the general architecture of a chassis used for call setup and release of channels for telephone calls. (See for example pp. 8-9 the memory management in relation to call connection and termination). Call setup and release of channels for telephone calls do not disclose or suggest the claimed dynamic management of feature rights. Mazza et al. disclose license keys for individually enabling licenses. Neither reference suggest the claimed allocation of “feature units.” The present inventions allocate these units among the cards.

Additionally, the Office Action assumes that one of ordinary skill at the time of the inventions would have implemented a feature management scheme using the chassis elements in the claimed arrangement. Neither reference teaches the claimed receipt of a key by a system manager card in a chassis for the purpose of allocating features to application cards over a common backplane bus to slots of at least one chassis. Mazza et al. do not disclose or suggest the system manager card or application card elements nor their chassis arrangement with slots or a common backplane bus.

The present inventions allow a plurality of application cards in a chassis to obtain rights from a system manager card to enable or disable features therein. These rights are received in a chassis by a system manager card in the form of in keys. In so doing features such as prepaid billing can be allocated among cards (new claims 39 and 40) and reallocated when new cards are removed and replaced in the chassis (new claim 41). Furthermore a destination ID can be used to match with a serial number to confirm a key is intended for the hardware (new claim 43). Ghahremani et al. manage calls and channels, not features allocated to an application card. Mazza et al. in combination does not disclose “feature units” nor in combination would have provided the claimed elements in the claimed arrangement.

Accordingly it is submitted that, for the above reasons and the reasons previously submitted, the independent claims and new claims are patentable over Ghahremani et al. and Mazza et al.

Furthermore, pending dependent claims 2, 7, 9, 10, 20-28 and 30-43 contain the limitations of their corresponding independent claims 1 or 19 and are patentable over Ghahremani et al. and Mazza et al. for the reasons discussed above. Furthermore, dependent claims 2-10, 20-28 and 30, 33 and 37 contain additional limitations which are not taught or suggested by Ghahremani et al. and Mazza et al.

For example, claims 30, 33 and 37 recite that the features are telecommunications features. Mazza et al., on the other hand, disclose check-in and check-out of software applications, not telecommunications features. And Ghahremani et al., as discussed above, disclose the setup of calls, not telecommunications features. Furthermore by the doctrine of claim differentiation the

definition of the term “telecommunications features” contains the prepaid billing feature of Claims 34 and 38. Claims 8 and 26 also recite that each feature key comprises a plurality of feature rights including a) feature units, b) a feature category, and c) a distribution node identifier. Ghahremani et al. and Mazza et al. do not disclose or suggest at least feature categories or distribution node identifiers by the check-in and check-out of software applications. Claim 39 recites that the feature units designate a number of the application cards that are permitted to use a feature and the feature rights management agent allocates the feature to application cards. Claim 40 also recites that the feature allocated is a prepaid billing feature in a telecommunications system implemented on application cards in the chassis. Claim 41 recites that the feature units designate a maximum use for a feature and the feature rights management agent re-allocates the feature rights among application cards when application cars are removed and replaced in the chassis. New dependent claim 42 recites that the feature units designate a maximum number of simultaneous telephone calls that are permitted to use a given feature and the feature rights management agent allocates the maximum number of simultaneous telephone calls that are permitted to use a given feature to application cards. New dependent claim 43 recites that the feature keys further include a destination ID and the feature rights management agent confirms that the destination ID matches a serial number of the hardware of the feature rights management apparatus.

Accordingly, reconsideration and withdrawal of the rejection of claims 1, 2, 7, 9, 10, 19-28, 30, 33 and 37 under 35 U.S.C. §103(a) over Ghahremani et al. in view of Mazza et al. is respectfully requested.

On page 8, item 16 of the June 7, 2006 Office Action, new claims 31, 35, 32 and 36 were rejected under 35 U.S.C. §103(a) as obvious over Ghahremani et al. (U.S. Patent Publication No. 2005-0180429) and Mazza et al. (U.S. Patent Publication No. 2004-199760) further in view of Summers et al. (U.S. Patent No. 6,098,133).

Summers et al. do not disclose or suggest, alone or in combination, that “the common backplane bus of the chassis is a trusted bus” (claims 31 and 32) or that “the common backplane bus of the chassis connects the plurality of application cards to the system manager card over a

trusted intra-card bus” (claims 35 and 36). In the present inventions the common backplane bus is trusted because it is on one or more chassis that the two cards (system manger and the individual application blade) reside.

Accordingly, reconsideration and withdrawal of the rejection of claims 31, 35, 32 and 36 under 35 U.S.C. §103(a) over Ghahremani et al. in view of Mazza et al. and Summers et al. is respectfully requested.

On page 9, item 18 of the June 7, 2006 Office Action, new claims 34 and 38 were rejected under 35 U.S.C. §103(a) as obvious over Ghahremani et al. (U.S. Patent Publication No. 2005-0180429) and Mazza et al. (U.S. Patent Publication No. 2004-199760) further in view of Salkini et al. (U.S. Patent No. 6,912,203).

Salkini et al. do not disclose or suggest the enablement of a prepaid billing feature on application cards in a chassis. One of skill at the time of the inventions would not have combined three references to show the claimed elements of a system manager card and application cards in the claimed arrangement of a chassis using feature keys for this prepaid feature or for the reasons above with respect to the independent claims.

Accordingly, reconsideration and withdrawal of the rejection of claims 34 and 38 under 35 U.S.C. §103(a) over Ghahremani et al. in view of Mazza et al. and Salkini et al. is respectfully requested.

Conclusion

All the issues in the Office Action have been addressed. Favorable consideration of the present application is requested. If any issues remain, the Examiner is invited to call the undersigned.

The Examiner is invited to contact the Applicants' Representative at the below-listed telephone number if there are any questions regarding this communication.

Respectfully submitted,

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By their Representatives,

By



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